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Richard W. Slack

Attorneys for Lehman Brothers
Holdings Inc. and Certain of Its Affiliates

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	:
	:
Debtors.	:
-----X	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:
	:
Plaintiff,	:
	:
-against-	:
	:
BALLYROCK ABS CDO 2007-1 LIMITED; WELLS	:
FARGO BANK, N.A., as Trustee; BARCLAYS BANK,	:
PLC, as owner of beneficial interests in the Senior Notes;	:
LONG ISLAND INTERNATIONAL LIMITED, as owner	:
of beneficial interests in the Senior Notes; LONG HILL	:
2006-1 LTD., as owner of beneficial interests in the Senior	:
Notes; BLACKROCK MORTGAGE INVESTORS	:
MASTER FUND, L.P., as owner of beneficial interests in	:
the Senior Notes,	:
Defendants.	:
-----X	

Chapter 11
Case No. 08-13555 (SCC)
(Jointly Administered)

Adversary Proceeding
No.: 09-01032 (SCC)

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING MOTION OF
LEHMAN BROTHERS HOLDINGS INC. FOR RELEASE OF REMAINING
INTERPLEADED FUNDS TO LEHMAN BROTHERS SPECIAL FINANCING INC.**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures* (the "Second Amended Case Management Order") [ECF No. 9635], the undersigned hereby certifies as follows:

1. On June 4, 2014, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the "Plan"), filed with this Court the *Motion of Lehman Brothers Holdings Inc. for Release of Remaining Interpleaded Funds to Lehman Brothers Special Financing Inc.* (the "Motion") [ECF No. 182].

2. In accordance with the Second Amended Case Management Order, June 12, 2014 at 4:00 p.m. (Prevailing Eastern Time) was established as the deadline for parties to object or file responses to the Motion (the "Objection Deadline").¹ The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections have been filed prior to the Objection Deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Objection Deadline has now passed and, to the best of my knowledge, no objection or other responsive pleading to the Motion has been filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second

¹ The Objection Deadline was extended until the time of this filing for Wells Fargo Bank, N.A., the Trustee, which has agreed to the proposed Agreed Order.

Amended Case Management Order, nor has any objection or other responsive pleading with respect to the Motion been served on the Plan Administrator's counsel.

4. Accordingly, for the reasons set forth in the Motion, the Plan Administrator respectfully request that the proposed Agreed Order annexed hereto as Exhibit A be entered in accordance with the procedures described in the Second Amended Case Management Order.

5. I declare that the foregoing is true and correct.

Dated: June 13, 2014
New York, New York

/s/ Richard W. Slack
Richard W. Slack

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EXHIBIT A

(Proposed Order – ECF No. 182)

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FARGO BANK, N.A., as Trustee; BARCLAYS BANK,	:
PLC, as owner of beneficial interests in the Senior Notes;	:
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Notes; BLACKROCK MORTGAGE INVESTORS	:
MASTER FUND, L.P., as owner of beneficial interests in	:
the Senior Notes,	:
Defendants.	:
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Chapter 11
Case No. 08-13555 (SCC)
(Jointly Administered)

Adversary Proceeding
No.: 09-01032 (SCC)

**AGREED ORDER GRANTING MOTION OF LEHMAN BROTHERS HOLDINGS INC.
FOR RELEASE OF REMAINING INTERPLEADED FUNDS TO
LEHMAN BROTHERS SPECIAL FINANCING INC.**

Upon consideration of the Motion of Lehman Brothers Holdings Inc. for Release of
Remaining Interpleaded Funds to Lehman Brothers Special Financing Inc., dated June 4, 2014
[ECF No. 182] (the "Motion"); and there being no objection thereto; and the Court having

jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [Case No. 08-13555; ECF No. 9635]; and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the record establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED, ADJUDGED AND DECREED THAT:

1. The Motion is GRANTED. Within three (3) business days of entry of this Order, Wells Fargo Bank, N.A., as Trustee (the “Trustee”), shall distribute to Lehman Brothers Special Financing Inc. (“LBSF”) the entire amount of the Interpleaded Funds, as defined in the Motion, except that the Trustee shall retain \$200,000 in the Interpleader Escrow, as defined in the Order Granting Interpleader to Wells Fargo Bank, N.A. for Disputed Funds [ECF No. 27] (the “Interpleader Order”).

2. Within thirty (30) business days of entry of this Order (and in accordance with the general procedure set forth in the Order Granting Preservation of Status Quo for Disputed Funds, Notice of Interpleader Request and Payment of Trustee Fees [ECF No. 18] (the “Interpleader Notice Order”)), the Trustee shall provide a Notice, as defined in the Interpleader Notice Order, requesting payment of all trustee fees, costs, expenses and reasonable attorneys’ fees allowed up and to that time under the Interpleader Order. At the same time that the Trustee provides the

Notice, the Trustee shall provide substantiation of the amounts requested in the Notice to all parties appearing in the action. Any objection to the fees or expenses requested shall be submitted to the Trustee not later than ten (10) business days after the Notice was served (the “Objection Deadline”). If no objection is filed, then the Trustee shall, within seven (7) business days of the Objection Deadline: (i) file a notice indicating no objection was received; (ii) withdraw from the Interpleader Escrow the amount requested in the Notice up to \$200,000; and (iii) distribute to LBSF the remaining amount, if any, from the Interpleader Escrow. If an objection is timely provided, the Trustee and the objecting party may attempt to resolve the objection and, if resolved, to allow for the Trustee to collect the agreed-upon portion of any fee or expense. If an objection cannot be resolved, either the Trustee or the objecting party may request a hearing before this Court. If a hearing is requested, the Trustee shall, within seven (7) business days after a determination becomes final and no longer appealable, withdraw from the Interpleader Escrow the amount, if any, permitted by the Court and distribute to LBSF the remaining amount from the Interpleader Escrow.

3. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: _____, 2014

New York, New York

UNITED STATES BANKRUPTCY JUDGE